April 6, 2022

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS EL PASO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT

§	
§ §	EP-22-CR-00444-FM
§	<u>INDICTMENT</u>
§	
§	COUNT ONE: 18 U.S.C. § 2339B -
§	Conspiracy to Provide Material Support to a
§	Designated Foreign Terrorist Organization;
§	
§	COUNT TWO: 18 U.S.C. § 2339B -
§	Providing Material Support to a Designated
§	Foreign Terrorist Organization;
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THE GRAND JURY CHARGES:

COUNT ONE (18 U.S.C. § 2339B)

CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION

On or about October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (hereinafter "AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a foreign terrorist organization (FTO), under Section 219 of the Immigration and Nationality Act (INA) and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as a FTO under Section 219 of the INA and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al- Sham ("ISIS"), the Islamic State of Iraq and Syria ("ISIS"), ad-Dawla al Islamiyya fi al-'Iraq wa-sh'Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media

Production. On or about September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

Beginning on or about September 1, 2014, and continuing through and including on or about October 15, 2016, in the Western District of Texas, the District of New Mexico, and elsewhere, the Defendant,

MOHAMMAD ADNAN BASSAM LULU, (a.k.a.): Muhammad Adnan Bassam Lulu Al-Amriki, and Abu Malik,

and others did knowingly and willfully combine, conspire, confederate and agree with each other, to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including services and personnel, including the defendant, to a foreign terrorist organization, namely, ISIS, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that ISIS engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

All in violation of Title 18, United States Code, Section 2339B.

COUNT TWO (18 U.S.C. § 2339B)

PROVIDING AND ATTEMPTING TO PROVIDE MATERIAL SUPPORT TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION

2

Beginning on or about July 16, 2015, and continuing through and including on or about

October 15, 2016, in ISIS-controlled territory in Syria and Iraq, the Defendant,

MOHAMMAD ADNAN BASSAM LULU,

(a.k.a.): Muhammad Adnan Bassam Lulu Al-Amriki, and Abu Malik,

whose last known United States residence was in the Western District of Texas, did knowingly

provide and attempt to provide material support and resources, as defined in Title 18, United

States Code, Section 2339A(b), including services and personnel, including himself, to a

foreign terrorist organization, namely, ISIS, which at all relevant times was designated by

the United States Secretary of State as a foreign terrorist organization pursuant to Section

219 of the Immigration and Nationality Act, knowing that ISIS was a designated foreign

terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that

ISIS engages and has engaged in terrorist activity(as defined in Section 212(a)(3)(B) of the

Immigration and Nationality Act), and that ISIS engages and has engaged in terrorism (as

defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988

and 1989). All in violation of Title 18, United States Code, Sections 2339B.

ASHLEY C. HOFF

United States Attorney

Assistant United States Attorney

3